

2. It was a part and an object of the conspiracy that CHINWENDU ALISIGWE, the defendant, and others known and unknown, knowingly would and did execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property

owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

**COUNT TWO**  
(Bank Fraud)

The Grand Jury further charges:

3. From at least in or about November 2016 up to and including at least October 2019, in the Southern District of New York and elsewhere, CHINWENDU ALISIGWE, the defendant, knowingly did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, ALISIGWE opened bank accounts at financial institutions using false identification documents in order to receive funds that were the proceeds of fraud and to which he was not entitled, before withdrawing or wiring the funds to other accounts.

(Title 18, United States Code, Sections 1344 and 2.)

**COUNT THREE**

(Aggravated Identity Theft)

The Grand Jury further charges:

4. From at least in or about November 2016 up to and including at least October 2019, in the Southern District of New York and elsewhere, CHINWENDU ALISIGWE, the defendant, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, ALISIGWE possessed and used fraudulently obtained passports in the name of other individuals during and in relation to the felony violations charged in Counts One and Two of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

**FORFEITURE ALLEGATION**

5. As a result of committing the offenses alleged in Counts One and Two of this Indictment, CHINWENDU ALISIGWE, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting or derived from, proceeds obtained directly or indirectly, as a result of the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

Substitute Assets Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

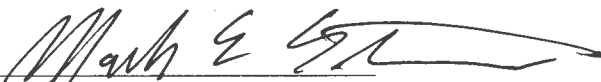
c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
DAMIAN WILLIAMS  
United States Attorney

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA

- v. -

CHINWENDU ALISIGWE,

Defendant.

---

INDICTMENT

22 Cr. \_\_\_\_

(18 U.S.C. §§ 1349, 1344, 1028A and 2.)

DAMIAN WILLIAMS  
United States Attorney

---

  
Foreperson

---

08/04/22

CA

INDICTMENT FILED  
WHEELA - DJ CAPRONI

KH PARKER  
USMJ